

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

---

IN RE:	:	
Jorge Colon	:	Case No.: 18-12337-MDC
	:	
Debtor	:	Chapter 13

---

**MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY**

Comes Now, Jorge Colon, hereinafter referred to as “Debtor” and moves this Honorable Court to vacate its January 13, 2021 Order Modifying Section 362 Automatic Stay and in support thereof avers the following:

1. The above captioned bankruptcy matter was filed as a Chapter 13 on or about April 6, 2018.
2. The Chapter 13 bankruptcy matter was assigned case number 18-12337.
3. The Chapter 13 Plan was confirmed by this Honorable Court on December 20, 2018.
4. On or about February 17, 2020, Debtor and U.S. Bank Trust National Association, as Trustee of the Bungalow Series IV Trust (hereinafter referred to as “US Bank”) entered into a Stipulation, attached hereto as Exhibit “A”, wherein Debtor agreed to cure Post-petition arrears and continue making regular and timely mortgage payments.
6. The Order was entered subsequent to a Certificate of Default filed on or about January 5, 2021 by US Bank.
7. On or about January 13, 2021 this Court entered an Order in favor of US Bank for Relief from the Automatic Stay.

8. Debtor was unable to pay during the months of October through December due to illness.

9. The Debtor is desirous of keeping his real property located at 8837 Roosevelt Blvd Philadelphia, PA 19152 and will pay any and all post-petition delinquencies prior to the hearing on the instant Motion.

**WHEREFORE**, for the reasons stated herein, the Debtor respectfully request that this Honorable Court Vacate its January 13, 2021 Order Modifying the Automatic Stay.

Respectfully submitted,

/s/ Brad J. Sadek, Esquire

Brad J. Sadek, Esquire

Sadek and Cooper

1315 Walnut Street

Suite 502

Philadelphia, PA 19107

Dated: January 18, 2021